

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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THE LINCOLN NATIONAL LIFE INSURANCE
COMPANY,

Plaintiff,

-v-

ELI INZLICHT-SPREI *et al.*,

Defendants.
-----X

No. 1:16-cv-5171

ECF CASE

**DECLARATION OF GERALD KROLL IN SUPPORT OF
ELI INZLICHT-SPREI'S MOTION FOR SUMMARY JUDGMENT**

I, Gerald Kroll, declare under penalty of perjury that the foregoing is true and correct:

1. I am member of Kroll Law PLLC and I submit this declaration in support of Defendant Eli Inzlicht-Sprei's motion for summary judgment.
2. During a December 9, 2016 conference call between counsel and Magistrate Judge Robert Levy, I informed the Court that Defendant Eli Inzlicht-Sprei challenged the validity of the purported sale transaction due to forged signatures on the transaction documents.
3. Below follows a list of exhibits consisting of true and correct copies of documents produced, and excerpts of depositions taken, in this action:
 - Ex. 1: Sara Sprei Family Trust Agreement, dated as of March 28, 2008
 - Ex. 2: Bates # BSI-LN v Sprei 00000027
 - Ex. 3: License Detail for William Segal
 - Ex. 4: Deposition of Herman Segal;
 - Ex. 5: Deposition of Avi Rosenfeld
 - Ex. 6: Document Bates #WF_SPREI 00013781
 - Ex. 7: Deposition of Alan Rubenstein
 - Ex. 8: Deposition of Eli Inzlicht-Sprei
 - Ex. 10: Deposition of Nachum Salzman

- Ex. 11: Deposition of William Segal
- Ex. 12: WF_SPREI 00011802
- Ex. 13: Deposition of Robert White
- Ex. 14: WF_SPREI 00011804
- Ex. 15: E-mail dated November 21, 2017 from Kroll to Gworek
- Ex. 16: Bates AR 0076
- Ex. 17: Bates 0265-0266
- Ex. 18: Rubenstein Depo Exhibit 163 AR0055
- Ex. 19: Rubenstein Deposition Exhibit 152
- Ex. 20: WF SPREI 00012251
- EX 21: Deposition of John Dallas
- Ex. 22: Deposition of Brent Oliver
- Ex. 23: Deposition Exhibit 111, Bates #5118-5121
- Ex. 24: Deposition Exhibit 139, Bates 5797-5798
- Ex. 25: Deposition Exhibit 113 (white deposition)
- Ex. 26: Deposition Exhibit 115 (White Depo) (Bates 3552-3555)
- Ex. 27: Deposition of Bradford Cowburn
- Ex. 28: Bates # WF Sprei 00012035-00012036; WF SPREI 00012037-00012038; WF_SPREI 00012039, 00012040; WF_SPREI 00012050-00012054; WF_SPREI 00012071; WF_SPREI 00012076; WF_SPREI 00012095; WF_SPREI 00012096-00012100; WF_SPREI 00012095; WF_SPREI 0001222, 00012223, 00012224; 00012225; WF_SPREI 00012228; 00012229-000122232; WF_SPREI 00012228; 00012229-000122232; WF_SPREI 00012288; WF_SPREI 00012300.\ WF_SPREI 00012251; WF_SPREI 00012260, 00012265-00012268; WF_SPREI 00012278; WF_SPREI 00012288; WF_SPREI 00012300; WF_SPREI 00012316; WF_SPREI 00012347-00012357; WF_SPREI 00012440; WF_SPREI 00012441 and 00012444; WF_SPREI 00012730; AR1295, 1296, WF_SPREI 00012732, 00012733; WF_SPREI 00012786, 12787; WF_SPREI 00013024; WF_SPREI 00013117; WF_SPREI 00013341; WF_SPREI 00013539; WF_SPREI 00013538; WF_SPREI 00013719; WF_SPREI 00013751; WF_SPREI 00013757; AR 237; AR 242; WF_SPREI 00013789, 00013790, 00013791; WF_SPREI 00013792 – 00013892; WF_SPREI00014095; WF_SPREI00014095; WF_SPREI 00014096-00014132;

- Ex. 29: Deposition Exhibit 207
- Ex. 30: Bates no. 1564
- Ex. 31: Bates 1563
- Ex. 32: *Settlement Funding, LLC v. Axa Equitable Life Insurance Co.*, 2011 WL 1097635 (S.D.N.Y. 2011)
- Ex. 33: March 8, 2017 indemnity letter
- Ex. 34: WF SPREI 000122238
- Ex. 35: WF SPREI 00013779-00013783
- Ex. 36: WF SPREI 00013789, 13790, 13791; AR 242
- Ex. 37: Bates Sprei 0026
- Ex. 38: License Detail for William Segal
- Ex. 39: Rosenfeld Deposition Exhibit 207
- Ex. 40: Document from Lincoln website re Lincoln not authorized in NY
- Ex. 41: WF SPREI 00003720
- Ex. 42: BSI LN SPREI 000000027
- Ex. 43: William Segal NJ License
- Ex. 44: Page from Trust Agreement
- Ex. 45: Re Trustee Address in Trust document
- Ex. 46: BSI LN SPREI 000000038
- Ex. 47: BSI LN SPREI 000000050
- Ex. 48: LINCOLN0000303
- Ex. 49: BSI LN SPREI 000000067
- Ex. 50: BSI LN SPREI 000000044
- Ex. 51: BSI LN SPREI 00000226
- Ex. 52: BSI LN SPREI 00000694
- Ex. 53: BSI LN SPREI 00000215

- Ex. 54: BSI LN SPREI 00000675
- Ex. 55: BSI LN SPREI 00000694
- Ex. 56: BSI LN SPREI 00000753
- Ex. 57: BSI LN SPREI 00000068
- Ex. 58: BSI LN SPREI 00000183
- Ex. 59: BSI LN SPREI 00000226-228
- Ex. 60: Oliver Deposition Exhibit 132
- Ex. 61: Oliver Deposition Exhibit 134
- Ex. 62: WF Sprei 00013782
- Ex. 63: WF Sprei 00013783

Executed on this 17th day of April, 2019

/s/ Gerald Kroll
Gerald Kroll